

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VIRDA BELL BULLARD; et. al.)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 07-C-6883
)	
BURLINGTON NORTHERN SANTA)	
FE RAILWAY COMPANY; KOPPERS)	Judge Kennelly
INDUSTRIES, INC.; MONSANTO)	
COMPANY; DOW CHEMICAL)	
COMPANY; AND VULCAN)	Magistrate Judge Ashman
MATERIALS COMPANY)	
)	
Defendants.)	

AFFIDAVIT OF MICHAEL J. MANCIONE

Michael J. Mancione, being first duly sworn, on oath deposes and states as follows:

1. My name is Michael Mancione. I am over the age of eighteen, of sound mind and fully competent to execute this Affidavit.
2. I have been employed by Koppers Inc. ("Koppers") since its corporate inception in 1988. Koppers' corporate headquarters are located in Pittsburgh, Pennsylvania, where I have worked since 2002.
3. My current position is Vice President of North American operations for the Carbon Materials and Chemicals division. I am responsible for the supervision of manufacturing and sales operations at a facility located at 3900 S. Laramie Avenue in Cicero, Illinois ("Stickney Facility").
4. Between 1988 and 2002, I worked at the Stickney Facility in various capacities, including Supervisor of Production and Plant Manager.

5. The statements in this Affidavit are based on my personal knowledge derived from my employment with Koppers.

6. From 1988 to the present, Koppers has never manufactured or used pentachlorophenol ("PCP") at the Stickney Facility.

7. From 1988 to the present, Koppers has never sold or otherwise distributed PCP from the Stickney Facility to any other locations.

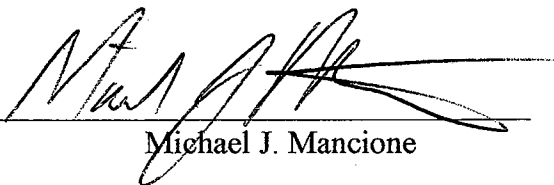
8. From 1988 to the present, Koppers has never received shipments of PCP at the Stickney Facility from any third parties.

9. From 1988 to the present, Koppers has never mixed PCP with creosote wood preservatives at the Stickney Facility.

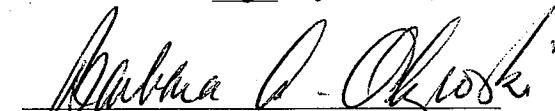
10. Regardless of the date, Koppers does not possess any records that suggest PCP was delivered from the Stickney Facility to the wood treatment facility located in Somerville, Texas ("Somerville Facility").

11. Koppers does not possess any records that suggest any wood treatment preservatives were delivered from the Stickney Facility to the Somerville Facility before 1996.

FURTHER AFFIANT SAYETH NOT.


Michael J. Mancione

Subscribed and sworn to
before me this 3 day of June, 2008.


Notary Public, State of Pennsylvania
My Commission Expires:

